

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- v. -

SCOTT STAMMERS,  
a/k/a "Shaun Simmons,"  
PHILIP SHACKELS,  
a/k/a "Paul Smith,"  
YE TIONG TAN LIM,  
a/k/a "Giorgio,"  
a/k/a "Triad,"  
and ALLAN KELLY PERALTA REYES,  
a/k/a "Allan Kelly Reyes Peralta,"  
a/k/a "Kelly,"

Defendants.

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:  
:  
: SEALED  
: INDICTMENT

13 CRIM 579

U.S. SDNY
DOCUMENT
ELECTRONICALLY FILED
DOCA#
DATE FILED JUL 31 2013

COUNT ONE

CONSPIRACY TO IMPORT METHAMPHETAMINE INTO THE UNITED STATES

The Grand Jury charges:

1. From at least in or about 2012, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, SCOTT STAMMERS, a/k/a "Shaun Simmons," PHILIP SHACKELS, a/k/a "Paul Smith," YE TIONG TAN LIM, a/k/a "Giorgio," a/k/a "Triad," and ALLAN KELLY PERALTA REYES, a/k/a "Allan Kelly Reyes Peralta," a/k/a "Kelly," the defendants, who will first enter the United States in the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

**JUDGE CARTER**

2. It was a part and an object of the conspiracy that SCOTT STAMMERS, a/k/a "Shaun Simmons," PHILIP SHACKELS, a/k/a "Paul Smith," YE TIONG TAN LIM, a/k/a "Giorgio," a/k/a "Triad," and ALLAN KELLY PERALTA REYES, a/k/a "Allan Kelly Reyes Peralta," a/k/a "Kelly," the defendants, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, five hundred grams and more of a mixture or substance containing a detectable amount of methamphetamine, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Sections 959(a), 959(c), 960(a)(3), and 960(b)(1)(H) of Title 21, United States Code.

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed:

a. In or about February 2013, PHILIP SHACKELS, a/k/a "Paul Smith," the defendant, caused methamphetamine to be shipped to an address in a foreign country ("Country-1"), so that the methamphetamine could subsequently be sent on to the United States.

b. In March 2013, SHACKELS and SCOTT STAMMERS, a/k/a "Shaun Simmons," the defendants, traveled to a location in a foreign country ("Country-2") to meet and discuss additional

drug transactions with two individuals who represented themselves to be drug dealers importing narcotics into the United States, but who were, in fact, confidential sources to the Drug Enforcement Administration (the "CSes").

c. In May 2013, YE TIONG TAN LIM, a/k/a "Giorgio," a/k/a "Triad," and ALLAN KELLY PERALTA REYES, a/k/a "Allan Kelly Reyes Peralta," a/k/a "Kelly," the defendants, traveled to a location in Country-2 to discuss providing additional methamphetamine to the CSes for sale in the United States.

(Title 21, United States Code, Sections 963 and 959(c).)

#### FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One, SCOTT STAMMERS, a/k/a "Shaun Simmons," PHILIP SHACKELS, a/k/a "Paul Smith," YE TIONG TAN LIM, a/k/a "Giorgio," a/k/a "Triad," and ALLAN KELLY PERALTA REYES, a/k/a "Allan Kelly Reyes Peralta," a/k/a "Kelly," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 970, any and all property constituting and derived from any proceeds that the defendants obtained directly and indirectly as a result of the said violation and any and all property used and intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One, including but not limited to, a sum of money representing the amount of

proceeds obtained as a result of the offense described in Count One of this Indictment.

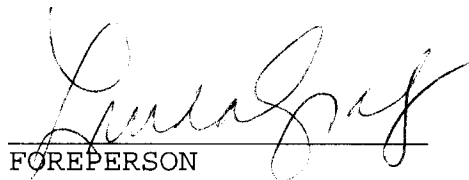
Substitute Assets Provision


5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 970, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 21, United States Code, Sections 963 and 970.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SEALED  
INDICTMENT

13 Cr.

(21 U.S.C. §§ 959, 960(a)(3), and  
960(b)(1)(H).)

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PREET BHARARA  
United States Attorney.

A TRUE BILL

  
Foreperson.

7/31/13 - Filed sealed indictment  
on A/U's issued  
Judge Maas  
LHM2